

**In the Matter Of:**

LAURIE ORTOLANO vs

CITY OF NASHUA

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**STEVEN BOLTON**

*May 13, 2024*

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

CIVIL ACTION NO. 22-cv-000326-LM

-----x  
LAURIE ORTOLANO,

Plaintiff

v.

THE CITY OF NASHUA, ET AL.,

Defendants

-----x  
DEPOSITION OF STEVEN BOLTON taken on  
behalf of the Plaintiff, pursuant to the applicable  
provisions of the Federal Rules of Civil Procedure,  
before Lauren M. Buzzerio, a Registered Professional  
Reporter, and Licensed Shorthand Reporter, in and  
for the State of New Hampshire, at the offices of  
Cullen Collimore Shirley PLLC, 37 Technology Way,  
Nashua, New Hampshire, on Monday, May 13, 2024.

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STEVEN BOLTON

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## STEVEN BOLTON

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**ALSO PRESENT:**  
Laurie Ortolano  
Christine Becotte  
Celia Leonard

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1 vociferous. And he can express his displeasure  
2 towards specific individuals.

3 Q. Was he ever barred from City Hall on a  
4 no trespass?

5 A. Not to my knowledge.

6 Q. During your tenure, your most recent  
7 tenure as corporate counsel, do you recall any  
8 citizen being disruptive, unruly, antagonistic,  
9 or anything like that?

10 MR. HILLIARD: Is that it?

11 MR. AIVALIKLES: Yeah.

12 A. I do.

13 Q. Okay. You do. And what were those  
14 circumstances?

15 A. Well, Ms. Ortolano.

16 Q. And what meeting did she attend? What  
17 committee meeting did she attend?

18 A. You didn't ask about committee  
19 meetings. You asked about City Hall.

20 Q. I apologize. Let me go back then. Do  
21 you recall any citizen -- let me strike that.  
22 Let's talk about Laurie. What was the first  
23 meeting, either aldermanic or committee

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1 meeting, that you recall where you were not  
2 happy with her conduct?

3 MR. HILLIARD: Object to form.

4 Go ahead.

5 A. I wouldn't say unhappy would capture  
6 at any time any of my feelings towards  
7 Ms. Ortolano.

8 Q. Well, what conduct did she exhibit at  
9 the committee meetings that you felt weren't  
10 appropriate?

11 A. She would use rough language. She  
12 would be accusatory toward people. She may or  
13 may not have had the right to do all of that.  
14 I still had my own opinions as to the  
15 appropriateness of it.

16 Q. Okay. What was the first meeting that  
17 you recall either aldermanic or committee  
18 meeting in which she used rough language?

19 A. I can't -- I can't give you a specific  
20 incident at a committee meeting.

21 Q. Well, how about the aldermanic --

22 A. Or the full board meetings?

23 Q. Yes.

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1           she use?

2           A. She has used many vulgar expressions.

3           Q. Can you for the record tell us what  
4           those are.

5           A. Shit. Fuck. Cunt. Asshole.

6           Q. Is that it?

7           A. That's all I can say at this time.

8           Q. Well, is that all you recall or all  
9           you can say? You can say more if you recall  
10           more?

11           A. That's what I recall at this time.

12           Q. And who was the statement "shit"  
13           directed to?

14           A. It was directed generally toward the  
15           City and its employees and officials.

16           Q. Okay. Did that include you?

17           A. Probably.

18           Q. Okay. And how about the use of the  
19           word "cunt"? Who was that directed to?

20           A. The first time I was aware of that, it  
21           was directed toward deputy corporation counsel  
22           Celia Leonard.

23           Q. And that was at an aldermanic or

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1           A. I believe that's correct.

2           Q. And that was at the finance committee  
3           meeting?

4           A. That's my recollection.

5           Q. Okay. But you don't remember who told  
6           you that she used that language at the finance  
7           committee?

8           A. I think someone told me I might want  
9           to view the video.

10          Q. Well, who would that someone be?

11          A. I don't remember.

12          Q. Well, would it be someone from your  
13          legal department?

14          A. I don't think so.

15          Q. Would it been an alderman?

16          A. It's possible. But I don't remember.

17          Q. Who did she call an asshole?

18          A. She called me that.

19          Q. And when was that?

20          A. Various occasions.

21          Q. How many? Do you recall?

22          A. Well, more than a couple; less than a  
23          dozen.

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1 thank Alderman Timmons for making such a  
2 pointed statement?

3 A. Again, I don't think I would use the  
4 word "deviant." But it was not a nice thing  
5 for the person to say.

6 Q. Well, there's a lot of nice things  
7 that people -- there's a lot of not nice things  
8 that people say at aldermanic meetings,  
9 correct?

10 A. Yes.

11 Q. Yeah. And you've heard them directed  
12 to you, correct?

13 A. Yes.

14 Q. And as an alderman, don't you have to  
15 sort of accept that as part of the territory?

16 MR. HILLIARD: Object to the form.

17 Go ahead.

18 A. My general understanding is aldermen  
19 and city officials of every nature do not give  
20 up their own First Amendment rights. So they  
21 have a right to respond and say what they  
22 think. If people don't like that, they can be  
23 voted out of office.

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1           A. Last week.

2           Q. Okay. When you were reading it, was  
3           there anything there that you disagreed with?

4           A. Yes.

5           Q. What was that?

6           A. He seems to believe that sometime  
7           after the January incident, after I spoke with  
8           him, that I had some conversations with Captain  
9           Kenney and advocated with Captain Kenney that  
10           Ms. Ortolano should be criminally charged. I  
11           don't think that's accurate.

12           Q. Did you speak with Captain Kenney?

13           A. During that time frame, no.

14           Q. So between January 22, 2021, and when  
15           she was arrested, you had no conversations with  
16           Captain Kenney?

17           A. He might have been present on a Zoom  
18           conference where Chief Carignan and many of his  
19           high-ranking officers were also in the room  
20           where they were gathered. And so I don't know  
21           one way or another whether Captain Kenney was  
22           there. But the conversation chiefly was  
23           between myself and Chief Carignan. Other than

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1       that, I had no interaction with Captain Kenney  
2       during that time frame.

3       Q. Did you have interaction with any  
4       other police officials between January 22,  
5       2021, and when Laurie was arrested in February  
6       of 2021?

7       A. With Chief Carignan and to the extent  
8       others were present in the conference room  
9       where Carignan was where we had that Zoom  
10      conference. Other than that, no.

11      Q. Well, excluding that conference, did  
12      you have any contact or did anyone in your  
13      department have any contact with the police  
14      between January 22, 2021, and when Laurie was  
15      arrested in February of 2021?

16      A. I believe the three persons in the  
17      office who were present for the incident were  
18      all interviewed by a police officer.

19      Q. Okay. And who contacted the police to  
20      ask that they be interviewed?

21      A. I did.

22      Q. You did. So you had had contact with  
23      the police?

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1                   A. Only with Chief Carignan.

2                   Q. Okay. So you called Chief Carignan  
3 and asked him to interview these three people  
4 as part of the investigation?

5                   A. Essentially, yes. I said I thought  
6 the witnesses should be interviewed before a  
7 decision was made as to whether there should be  
8 charges or not.

9                   Q. And you were not happy when the police  
10 concluded on January 22, 2021, that there was  
11 no offense alleged or apparent? You were not  
12 happy with that finding, were you?

13                  A. I didn't know that there had been a  
14 particular finding of that nature.

15                  Q. So you never saw the police report  
16 indicating that?

17                  A. Not at the time frame we're talking  
18 about.

19                  Q. You were told, were you not, that the  
20 police did not find any criminal offense or  
21 apparent criminal offense, correct?

22                  A. No.

23                  Q. You never knew that?

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1           A. I knew that it was printed in the  
2 paper that nothing more was going to be done.

3           Q. Right.

4           A. That's all I knew.

5           Q. And when you read that in the paper,  
6 did you contact Chief Carignan -- Carignan, I'm  
7 sorry -- to find out if they were going to do  
8 any further investigation?

9           A. I called him and advocated that I  
10 thought that witnesses should be interviewed  
11 before a decision was made on whether to charge  
12 or not charge.

13           Q. You also advocated to him that Laurie  
14 should be charged and prosecuted for criminal  
15 trespass, didn't you?

16           A. I was advocating that an  
17 investigation -- witnesses should be  
18 interviewed before that decision was made.

19           Q. Did you tell any police officer that  
20 Laurie should be arrested for criminal  
21 trespass?

22           A. I don't believe I did.

23           Q. Did you tell any police officer that

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1       Laurie should be charged with criminal  
2       trespass?

3           A. Concerning this incident?

4           Q. Yes.

5           A. No.

6           Q. We're talking about January 22, 2021.

7       Is your testimony under oath that you never  
8       told a police officer that Laurie should be  
9       charged with a criminal offense of criminal  
10      trespass?

11       A. I never said that.

12       Q. Okay.

13           MR. HILLIARD: Let's take a  
14       five-minute break when you're at a good  
15       stopping point.

16           MR. AIVALIKLES: This is probably a  
17       good point.

18           (Recess taken.)

19           MR. AIVALIKLES: Back on the record.

20       Q. So who were the participants in that  
21       Zoom meeting with the police other than  
22       yourself, former chief, possibly Captain  
23       Kenney? Was there anyone else?

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1                   A. Well, in the conference room in the  
2 legal department at City Hall there would've  
3 been me, Attorney Celia Leonard, Attorney Jesse  
4 Neumann, and legal assistant Mindy Lloyd. In  
5 the conference room at the police station,  
6 there would've been Chief Carignan and a number  
7 of other people, all of whom, I believe, were  
8 high-ranking police officers. My -- without  
9 having specific recollection, I think the two  
10 deputy chiefs were likely present. That would  
11 be Jim Testaverde and Kevin Rourke. There were  
12 probably a number of captains present, one of  
13 which may or may not have been Brian Kenney.  
14 There are seven captains. All seven may have  
15 been there. There may have only been four or  
16 five.

17                   Q. Do you know if that Zoom meeting was  
18 recorded?

19                   A. I don't know.

20                   Q. Who would have the transcript of the  
21 recording of that Zoom meeting? Would that be  
22 the police department or the City of Nashua?

23                   MR. CULLEN: Objection.

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happened with Laurie --

A. Yes.

Q. -- on January 22, 2021, correct?

A. That's why I refer to them as

witnesses. Yes.

Q. Right. And none of those witnesses forward at that time to give the police information that they had concerning the incident of January 22, 2021?

A. I don't think that's true.

Q. Who did?

A. All of them.

Q. They all spoke to the police?

**A. Yes.**

Q. Okay. And was there written statements done contemporaneously with them meeting with the police or after they met with the police?

A. I believe a police officer interviewed them each later on.

Q. Right. But did they interview them on January 22, 2021?

A. I believe the police officers who

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1 responded asked brief questions. And that may  
2 or may not have been fully captured in any of  
3 their reports. But I would not have called  
4 that an interview.

5 Q. So according to you, the police did  
6 speak with Mindy Lloyd on January 22, 2021?

7 A. I believe so.

8 Q. They spoke with Attorney Leonard on  
9 January 22, 2021?

10 A. I believe so.

11 Q. And they spoke with Attorney Neumann  
12 on January 22, 2021?

13 A. I believe so.

14 Q. And after speaking with them and  
15 speaking with Laurie, they determined that  
16 there was no crime or no appearance of a crime?

17 A. I don't know that.

18 Q. Well, I believe that we've talked  
19 about the report. So you never read any police  
20 report that indicates that at least on  
21 January 22, 2021, they do not feel that a crime  
22 had been committed?

23 A. Never is a long time. Are you talking

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1           A. I think he told me they were  
2           contemplating something like filed without a  
3           finding on condition that Ms. Ortolano stay  
4           away from the legal department.

5           Q. Did you agree with that?

6           A. No, I did not.

7           Q. Why not?

8           A. I didn't think that exhibited any  
9           remorse for what had gone on. I didn't think  
10           she had exhibited any remorse. And I thought  
11           if there was going to be that level of  
12           leniency, then some remorse was in order.

13           Q. So a finding without a finding is not  
14           a conviction, correct?

15           A. Correct.

16           Q. And what was it about her conduct that  
17           you felt she didn't exhibit remorse?

18           A. She was -- she was unremorseful in her  
19           comments either on the internet or in comments  
20           she made at various public meetings and in  
21           communications she sent to various people.

22           Q. So what -- by the way, how did you  
23           know about these incident comments?

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1       members of aldermen, the newspaper, or the  
2       internet that she did nothing wrong, you felt  
3       that you needed to have a conviction?

4            MR. HILLIARD: Object to the form.

5            MR. CULLEN: Objection to form.

6            A. I never said that I needed to have a  
7       conviction.

8            Q. But you wanted a conviction?

9            MR. CULLEN: Object to the form.

10           MR. HILLIARD: Same objection.

11           A. If -- I did not think placing it on  
12       file without a finding was an appropriate  
13       disposition. If there were other dispositions  
14       short of a conviction that indicated that it  
15       was unlikely to happen again, I might have been  
16       more satisfied with that.

17           Q. Well, did you suggest that to the  
18       police officer that, hey, you know, I don't  
19       have a problem with maybe a disposition that  
20       doesn't involve a conviction, but I want some  
21       kind of assurances that it's not going to  
22       happen again. Did you ever tell that to the  
23       prosecutor that that's what you were looking

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1 for?

2 A. I very specifically said I was looking  
3 for it never to happen again.

4 Q. Right. I understand that's what your  
5 stating. And if there was a disposition placed  
6 on file without a finding and a statement from  
7 Laurie that she would not do that again, would  
8 that have satisfied you?

9 MR. HILLIARD: Object to the form.

10 Go ahead.

11 A. That wasn't what we were discussing.

12 Q. Would that have satisfied you?

13 MR. HILLIARD: Objection.

14 A. I don't know.

15 Q. You don't know. Okay. That's fair  
16 enough. So you were insistent that there be a  
17 conviction because you wanted to make sure --

18 A. You're putting words in my mouth.

19 MR. HILLIARD: Let him finish the  
20 question and then you give your answer.

21 Q. You wanted to have a criminal  
22 conviction so that she would be humiliated,  
23 correct?

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1 no reason.

2 Q. Well, it doesn't say that Ms. Ortolano  
3 used the word "hauled out." That's a word you  
4 used. And what do you mean by that word  
5 "hauled out"?

6 A. I was responding to a question I was  
7 asked. My recollection is that that word was  
8 used by someone else before I repeated it.

9 Q. Did you tell the reporter that there  
10 was a sign outside of the office indicating  
11 that appointments are required and that  
12 Ortolano's actions were "out and out invasion"  
13 and intended to disrupt government operations  
14 seemingly inspired by events in Washington.  
15 Did you tell that to the reporter?

16 A. I can't remember precisely. I  
17 probably said something along the lines of  
18 there was a sign informing about appointments  
19 were required. I believe my reference to the  
20 January 6th events in Washington was a response  
21 to a question about isn't it a public building?  
22 Doesn't the public have every right to be in  
23 any portion of it? And I said something to the

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1                   effect of just like what happened in  
2                   Washington, members of the public cannot  
3                   interrupt the business of government, do not  
4                   have free access behind closed and locked  
5                   doors. I don't think I said, even though the  
6                   reporter puts it that way in the story, I don't  
7                   think I said that I thought Ms. Ortolano was  
8                   inspired by that. Because I don't think that.

9                   Q. Well, but you equated what she did to  
10                  the events on January 6th?

11                  MR. HILLIARD: Object to the form.

12                  A. I'm not sure I even equated it.  
13                  Because obviously that was much more serious.  
14                  People died.

15                  Q. Right.

16                  A. But I used that as a comparison when  
17                  asked to address isn't it a public building?  
18                  Doesn't the public have access to all parts of  
19                  a public building? And I said similar to that,  
20                  you don't have the right to go into spaces that  
21                  are designed for a certain purpose and disrupt  
22                  that purpose, disrupt the operation of  
23                  government.

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1                   Q. So are you equating the sitting down  
2                   in your office by Ms. Ortolano to disrupting  
3                   the certification of the President of the  
4                   United States?

5                   MR. HILLIARD: Object to the form.

6                   Q. Is that your equivalency?

7                   MR. HILLIARD: Asked and answered.

8                   MR. AIVALIKLES: I didn't ask him  
9                   that.

10                  MR. HILLIARD: No. You used the same  
11                  phraseology. One more time.

12                  A. I don't think they were equivalent. I  
13                  didn't think they were equivalent then. I used  
14                  a recent event as an example of the fact that  
15                  just because some building or some space is  
16                  publicly funded does not mean that at all times  
17                  it is open to the public.

18                  Q. Is it your testimony that that hallway  
19                  that people access to get into the legal  
20                  department is not available to the public?

21                  A. It's available to the public for the  
22                  purpose of accessing the spaces for the  
23                  business that are conducted in those spaces.

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1       It's not available to the public for the  
2       purpose of standing there to get in out of the  
3       rain and disrupt the flow of people who have  
4       legitimate business.

5       Q. So did Laurie break any windows trying  
6       to get into your office?

7       A. Not to my knowledge.

8       Q. Did she strike or assault any of your  
9       employees?

10      A. She pulled the door out of Mindy's  
11       hand.

12      Q. Was that an assault?

13      A. I wouldn't have characterized it that  
14       way.

15      Q. Did you hear her say where's Bolton?  
16       Where's Bolton? Where's Bolton?

17      A. I wasn't there.

18      Q. Did anyone tell you she was saying  
19       where's Bolton? Where's Bolton? Where's  
20       Bolton?

21      A. I was told she was demanding to see  
22       one of the attorneys. She may well have asked  
23       for me by name.

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1                   Q. Did she say hang Mayor Donchess? Hang  
2                    Mayor Donchess? He's a traitor?

3                   A. No one reported that to me.

4                   Q. You went on to say in this case,  
5                   happily, no one was injured or worse, but her  
6                   example does not make us any more comfortable  
7                   here. Did you make that statement?

8                   A. I don't remember whether I made it or  
9                   not.

10                  Q. Well, did you read this article?

11                  A. I may have.

12                  Q. Did you contact the reporter to say  
13                  that you misquoted me?

14                  A. I don't even remember if I read it.

15                  Q. Do you recall contacting the reporter  
16                  and saying you misquoted me in a newspaper  
17                  article?

18                  A. I know I've done similar things in the  
19                  past. I don't know if I did it in this case.

20                  Q. So you have done it in the past. But  
21                  you don't recall doing it in this case?

22                  A. Correct.

23                  Q. Okay. All right.

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1                   MR. HILLIARD: He doesn't recall if he  
2 did it in this case. But go ahead.

3                   Q. Now, you're aware that Laurie failed a  
4 request to discharge -- a condition to  
5 discharge the conviction of violation of  
6 criminal trespass, correct?

7                   A. To annul it.

8                   Q. Right. To annul it.

9                   MR. HILLIARD: Well, wait a minute.

10                  Let's --

11                  Q. This says discharge. But --

12                  MR. HILLIARD: Let's use the word in  
13 the document, please, instead of guessing what  
14 it is.

15                  Q. Was there a motion filed by an  
16 attorney representing the City opposing that  
17 annulment?

18                  A. I think there was.

19                  Q. And prior to it being filed, did you  
20 read it?

21                  A. I don't know.

22                  Q. How did you find out that there was a  
23 petition to annul her record?

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1 department, I don't think that was motivated at  
2 all by any assistance she was giving to any  
3 senior citizen.

4 Q. So it's your testimony that untruthful  
5 statements are not protected by the First  
6 Amendment of the U.S. Constitution?

7 MR. HILLIARD: Objection. Calls for  
8 conclusion of law.

9 A. I don't think I'm here as a  
10 constitution law expert. I would say when you  
11 asked me if there is anything wrong with that  
12 statement, that is inaccurate.

13 Q. You testified earlier that making  
14 false statements is not protected by the First  
15 Amendment, did you not?

16 A. I think I said I wasn't sure whether  
17 it was.

18 Q. And the remedy for making a false  
19 statement is a libel action or a slander  
20 action, isn't it?

21 MR. HILLIARD: Objection to the form.

22 A. In certain cases those remedies are  
23 available and all of the elements are met.

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1 conviction was annulled or the record of arrest  
2 was annulled?

3 A. I know.

4 Q. Well, would you tell us?

5 A. I don't have to tell you.

6 MR. HILLIARD: But I think under the  
7 statute the entirety is annulled. Arrest.  
Conviction. Everything.

8 Q. Are you aware that when people are  
9 arrested they are fingerprinted?

10 A. Generally speaking, I am aware of  
11 that.

12 Q. You would agree that's humiliating?

13 A. Not especially. No.

14 Q. You wouldn't be humiliated by having  
15 your fingerprints taken for a criminal arrest?

16 A. I don't know that it necessarily  
17 follows that the act of being fingerprinted is  
18 itself humiliating.

19 Q. I'm asking you. Would you --

20 A. And I'm telling you.

21 Q. No. Would you be humiliated if you  
22 were fingerprinted pursuant to an arrest?

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1                   A. Depends on the totality of the  
2                   circumstances.

3                   Q. So you're not going to answer the  
4                   question either yes or no?

5                   A. I gave you an answer.

6                   Q. Again, we'll see what the judge thinks  
7                   about that. Do you think it's humiliating to  
8                   have your -- being handcuffed with your hands  
9                   behind your back?

10                  A. I assume many people would find it so.

11                  Q. Right. Would you find it so?

12                  A. I don't know.

13                  Q. Would you find doing the perp walk to  
14                  be humiliating?

15                  A. I don't know what you mean by that  
16                  term.

17                  Q. You've never heard the term "perp  
18                  walk"?

19                  A. I've heard of it.

20                  Q. When you're handcuffed behind your  
21                  back and you're being led to a certain area,  
22                  either a jail cell or whatever. You've never  
23                  heard the term "perp walk"?

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1           A. I didn't say that. I said I didn't  
2 understand what you meant by it.

3           Q. Well, the questions are directed to  
4 you and what your understanding is, not what my  
5 -- my understanding is irrelevant. Okay.

6           A. Well, then I don't understand the  
7 question. So my understanding of a perp walk  
8 is when an arrested person is marched before  
9 members of the media.

10          Q. Okay. That's your understanding.  
11         Okay. That's fine. Do you think it's  
12 humiliating to have your mugshot?

13          A. No.

14          Q. No? Do you think it's humiliating to  
15 be placed in a jail cell while you're awaiting  
16 bail?

17          A. I don't imagine it's pleasant. I  
18 don't know if I've described it as humiliating.

19          Q. And if Laurie was charged with a  
20 violation of criminal trespass, she would not  
21 have been fingerprinted, she would not have  
22 been arrested, she would not have been  
23 handcuffed, she would not have had a mugshot,

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1 and she wouldn't have spent any time in a jail  
2 cell pending bail; isn't that correct?

3 A. I don't know if that's correct or not.

4 Q. Well, you did criminal work. Have you  
5 ever known anyone to be arrested for a  
6 violation?

7 A. Yes.

8 Q. What were the circumstances?

9 A. Many people are arrested for DUI,  
10 which is a violation on a first offense. And  
11 they go through all of that.

12 Q. Okay. Other than DWI?

13 A. I don't know if reckless driving would  
14 be handled similarly.

15 Q. Are people generally arrested for a  
16 violation of criminal trespass?

17 MR. HILLIARD: Object to the form.

18 A. I think people have been. I don't  
19 know generally.

20 Q. And do you know the consequences of  
21 having a conviction on your record in terms of,  
22 say, employment?

23 A. I don't imagine it helps.